

UNITED STATES DISTRICT COURT  
Northern District of Illinois  
EASTERN DIVISION

**FILED**

JAN 07 2016 EAG  
1-7-16

GORARD REED )  
Plaintiff )  
- vs - )

MARCUS HARAJ ~~et al~~ )  
Defendant )

CASE # 12 CV 8582

Presiding Judge

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

HONORABLE JAMES B. ZAGEL

## EX-PARTE COMMUNICATION NOW COMES GORARD REED pro-se

Asking this Honorable Court, to give Relief in this matter. For the following reasons:

- 1.) Plaintiff have filed the complaint 12 CV 8582 based on the MISCONDUCT of STAFF AND EVER SINCE THEN, STAFF AT STANVILLE C.C. has deliberately put plaintiff health and well being along with his life in harm. And fail to ADEQUATELY give him the due process, guarantee by the law.
- 2.) On August 20, 2015. Plaintiff was placed in confinement, preventing Plaintiff from answering to the defendants and their attorneys. litigation matters before this court. Which plaintiff went to a segregation building and his legal property went to another building. Plaintiff stayed in confinement for 21 days unable to receive any legal documents.
- 3.) throughout that confinement, plaintiff explained before and after that course. He informed staff that he was on medication, that may cause him to test positive of a drug test, and would the (C/O SHAW) call the



HEALTH CARE UNIT. BUT INSTEAD PROCEEDED THE PROCESS OF CONFINEMENT. (IN VIOLATION OF MY DUE PROCESS.)

N.) PLAINTIFF HAS REQUEST FOR DISCOVERY IN THIS MATTER, WHICH THE DEFENDANT REFUSE TO TURN-OVER VALUABLE INFORMATION AND FACTS, THAT WILL BRING FORTH A CREDIBLE CLAIM OF MISCONDUCT BY STAFF. (SEE EXAMPLE):

A.) GRIEVANCE OF CONDUCT OF ASSAULTS PERSONALLY BY MR. W. PERRY KICK, AND HOW IT IS RELEVANT TO PLAINTIFF'S CAUSE. PLAINTIFF WAS ASSAULTED ON 9/17/2011: AND A WITNESS BRADLEY MORGAN SIGNED A AFFIDAVIT, STATING THAT HE PERSONALLY HEARD KICK TELL ANOTHER INMATE TO BEAT PLAINTIFF UP. AND AFTER THE ASSAULT, STAFF, ON THE ADJUSTMENT COMMITTEE, ASSIST IN THE PROCESS OF FINDING PLAINTIFF GUILTY OF A FIGHT. INSTEAD OF THE TRUE FACTS THAT HE WAS ASSAULTED!

B.) DOCUMENTS OF PERRY KICK ARREST/AND CHARGING INSTRUMENT, WHICH ALSO IS RELEVANT TO THIS MATTER. BECAUSE DURING THE COURSE OF THE ASSAULT, PLAINTIFF FELT GRIEVANCE AGAINST PERRY KICK. AND AT THE TIME, HE WAS EMPLOYED BY I.D.O.C. / STATEVILLE. THIS IS A QUALITATIVE ISSUE OF FACT, THAT SHOULD BE GIVEN TO PLAINTIFF BEFORE HE CAN ANSWER DEFENDANT'S SUMMARY. AND HAS ISSUES RAISED IN PARAGRAPH A & B. SHOWS A FACT THAT SHOULD BE CONSIDERED AS RELEVANT TO THE COMPLAINT. AND IF IT IS NOT TRUE, DEFENDANT SHOULD FORWARD TO PROVE THE



litigant ~~Yates~~ are most. As they quoted in their summary Judge (Put up or shut up.) to not give up the above, means they shut-up, and assist in the cover-up!

C) Every since August 20, 2015, Plaintiff has not had access to the law library nor to his excess legal box in personal property. Every since his confinement to research and obtain documents that are relevant to his case.

D) STAFF/ADMINISTRATION has placed inmates in the cell with Plaintiff, to cause a problem. These individuals have serious mental health problem. From Sept 9, 2015 til the present date. Inmates have bullied, threatened, and assaulted Plaintiff. At this moment, Plaintiff is in year of his life. Because he got a inmate name Michael Williams, who always talking about killing someone throughout the day/night, beating people up, and how he took a extension cord, and tried to strangle a inmate! Every day is scared. Then on 1/2/2016, Williams told Plaintiff that he would choke him out, the next time he wake him up!

E) Plaintiff has requested through (I.A.) (Placement office, (Warden Lamb), and (I.D.C. Director) to get out of this building and cells with these evil peoples. Before someone get killed. Because I'm tired of getting beat up. And I don't want to die.



1.) DEFENDANTS REFUSE TO GIVE PLAINTIFF THE E-MAILS MEMORANDUM, OR NOTES WITH REGARDS TO:

- 1.) COMPLAINTS AGAINST PERRY KIRK FROM 2010 to 2015
- 2.) (I.A.) DOCUMENTS AND PHOTOS OF PLAINTIFF ASSAULT ON 9/11/2011.
- 3.) DEFENDANT PHILLIS TOLLEY EMAIL PERSONAL REPORT TO ADA JOHNSON ABOUT PLAINTIFF AND HER NOTES.
- 4.) THOMPSON AND BISHOP INVESTIGATIVE NOTES AND NAMES OF PERSONS WHO THESE DEFENDANTS TALK TO WITH REGARDS OF THEIR INVESTIGATIVE OBSERVATION, AND THE FACTS THAT LED THEM TO BELIEVE PLAINTIFF WAS GUILTY FOR FIGHTING INSTEAD OF A ASSAULT.

5.) THE GRIEVANCE OFFICE INVESTIGATIVE NOTES, REPORT AND MEMORANDUM, OF THE OVER-TYPING OF PLAINTIFF DISCIPLINARY ACTION OF A FIGHT TO EXPUNGE PLAINTIFF TICKET.

(C) WARDEN COLEMAN, WARDEN HARRIS AND WARDEN EDWARDS NOTES, REPORT, INVESTIGATIVE OBSERVATION, ON THE GRIEVANCE AND COMPLAINTS OF PERRY KIRK, FROM INMATES AND PLAINTIFF BEFORE HE WAS DISCHARGED/RE-HEARD.

ALL THE ABOVE ARE GENUINE ISSUE OF FACTS THAT ARE RAISED IN THE COMPLAINT, THAT THE PLAINTIFF IS ENTITLED TO HAVE IN DISCOVERY TO PROVE HIS CASE. AND WITHOUT THE DOCUMENT, IT WOULD BE HARD TO SHOW THIS COURT THE CONSISTENCE MISCONDUCT AT STATEVILLE. AND THE DELIBERATE DISREGARD TO HUMAN LIFE AND SAFETY



Plaintiff states that the Defendant has forwarded only a portion of the Discovery, none of which was litigated in Paragraph (7.) which does not change the Plaintiff's answer to Defendant's summary judgment motion.

Plaintiff states and ask this Honorable Court to assist in the matter of transferring Plaintiff from this facility. Due to the staff, fail to protect Plaintiff or perhaps putting Plaintiff in the position of getting hurt. Because he's filing complaints to charge what is occurring at Stateville. Plaintiff is dealing with medical problems, with no cure in sight, and Plaintiff can not get any of his legal affairs taken care. Plaintiff request throughout this facility is ignored or pushed to the side and/or retaliated for sticking up on what's happening the facility.

For example you order Defendant to hand over Discovery on August 30, 2015. And the Department where I asked for Discovery (I.A.) put me in confinement if that is not deliberately retaliation, Judge I don't know what is.

Wherefore I wish this Honorable Court Grant all such facts and issue within this motion and give relief.

/s/ Gerald Reed  
Gerald Reed

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GERALD REED  
PLAINTIFF

VS

MARCUS HAROLD ET AL

DEFENDANTS

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CLERK, U.S. DISTRICT COURT

NOTICE OF FILING

NOW COMES GERALD REED pro-se  
filing this motion for EX-PARTE COMMUNI-  
CATION, ENCLOSED within this on the DATE  
of JANUARY 3, 2016.

TO: The Clerk of the U.S.  
219 South Dearborn  
Chicago IL 60604

The following was placed in the hands of  
STAFF to be placed into the U.S. postal  
office on JANUARY 3, 2016.

1/ GERALD REED #1-32920  
Greenleaf  
P.O. BOX 113  
Joliet IL 60431-0112